

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JOE DASILVA, JR.,

*Plaintiff,*

Case No: 2:20-cv-11358

Hon. Mark A. Goldsmith

Magistrate Judge Anthony P. Patti

v.

CHRISTINE WORMUTH,  
Secretary of the Army, and  
MARTIN POTTER, in his  
individual capacity,

*Defendants.*

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Keith Altman, Esq. (P81702)  
The Law Office of Keith Altman  
33228 West 12 Mile Road, Suite 375  
Farmington Hills, MI 48331  
(248) 987-8929  
keithaltman@kaltmanlaw.com

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**PLAINTIFF'S EXHIBIT LIST  
AS OF SEPTEMBER 7, 2022**

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As mandated by the Court's Scheduling Order (ECF 60), Plaintiff Joe DaSilva, Jr. ("Plaintiff") by and through counsel, the Law Office of Keith Altman, hereby states that the following exhibits may be used at trial:

- a. All records maintained by the United States Army concerning or regarding Plaintiff, before, during, and after his time as a Fire

Fighter/EMT for the Detroit Arsenal Fire Department, including but not limited to all documents and electronic records in Mr. DaSilva's employee file.

- b. All records maintained by the United States Army concerning or regarding Martin Potter before, during, and after his time as Assistant Chief of the Detroit Arsenal Fire Department, including but not limited to all documents and electronic records in Mr. Potter's employee file.
- c. Communications between Plaintiff and the EEO/EEOC.
- d. Communications between Plaintiff and the Sexual Assault Response Coordinators (SARC).
- e. Communications between Plaintiff and member(s) of the SHARP Screening Team.
- f. Communications between Plaintiff and Defendant, Martin Potter. Specifically Email dated December 22, 2016 from Martin Potter to Plaintiff, Joe DaSilva.
- g. All records from and pertaining to Plaintiff's original EEO Complaint(s), subsequent investigation and determination.
- h. Negotiated Settlement Agreement between Joe DaSilva, Jr. and Robert M. Speer, Acting, Secretary of the Army, U.S. Army Garrison-

Detroit Arsenal, dated March 2017.

- i. Plaintiff's Work review for the period of January 1, 2016 through December 31, 2016.
- j. Medical Records of Joe DaSilva, Jr.
- k. Medical Expenses of Joe DaSilva, Jr.
- l. Records regarding any Workers Compensation claims of Joe DaSilva, Jr.
- m. Records regarding any Social Security Disability Benefits claims of Joe DaSilva, Jr.
- n. Complete work history of Joe DaSilva, Jr.
- o. Joe DaSilva's Application submission for Lead Fire Fighter Hazmat Tech/Base Life Support dated September 20, 2019.
- p. Voice recording of 2018 meeting between Joe DaSilva, Jr. and Arthur J. Young, Jr. (Director, Emergency Service for the United States Army).
- q. Documents produced in response to discovery requests in the present action.

Discovery and fact investigation remain ongoing in this action. Plaintiff reserves the right to identify additional exhibits and will disclose such once identified or become known to Plaintiff.

Dated: September 7, 2022

Respectfully submitted,

THE LAW OFFICE OF KEITH ALTMAN

By: /s/ Keith Altman

Keith Altman, Esq. (P81702)

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*Attorney for Plaintiff*

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**CERTIFICATE OF SERVICE**

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I certify that on September 7, 2022, I served the foregoing Plaintiff Joe DaSilva Jr.'s Exhibit List upon all parties herein by filing copies of same using the Court's ECF Filing System.

By: /s/ Keith Altman  
Keith Altman, Esq. (P81702)  
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*Attorney for Plaintiff*